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Counsel for Defendants MonaVie, Inc. and MonaVie. LLC

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

LISA PONTRELLI, in her individual capacity and on behalf of all others similarly situated,

Plaintiff,

VS.

MONA VIE, INC., a Utah Corporation, MONA VIE, LLC, a Delaware Limited Liability Company, and DOES 1-10, inclusive.

Defendant.

Civil Action No.: 13-cv-4649-(WJM)(MF)

STIPULATION AND PROPOSED CONSENT ORDER REGARDING CLASS CERTIFICATION DISCOVERY AND BRIEFING SCHEDULE

Plaintiff Lisa Pontrelli ("Plaintiff") and defendants MonaVie, Inc. and MonaVie, LLC ("Defendants"), through their respective undersigned counsel, hereby stipulate as follows:

WHEREAS, a notice of substitution of counsel for Plaintiff was filed on May 12, 2015 (Dkt. 30);

WHEREAS, Plaintiff's new counsel needs additional time to review the file and conduct discovery on class certification issues, and draft and serve responses to Defendants' discovery, which had been served on Plaintiff's former counsel;

WHEREAS, counsel for Defendants desire to conduct discovery on class certification issues, including, but not limited to, the deposition of Plaintiff, prior to commencement of briefing on class certification;

WHEREAS, counsel for Plaintiff and Defendants met and conferred regarding class certification discovery and briefing and have agreed to a schedule that accounts for these concerns and the personal and business commitments of both Plaintiff's and Defendants' counsel in the coming months.

Based upon the foregoing, contingent upon permission of the Court, the Parties hereby stipulate to the following class certification discovery and briefing schedule:

Plaintiff responds to Defendants' written discovery requests: June 12, 2015

Deadline for completion of Plaintiff's deposition: July 15, 2015

Plaintiff's opening brief in support of class certification: July 24, 2015

Defendant's opposition to class certification: September 3, 2015

Plaintiff's reply in support of class certification: September 17, 2015

Hearing on class certification:

To be determined by the Court

LITE DEPALMA GREENBERG, LLC

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Counsel for Plaintiff Lisa Pontrelli

and the Proposed Class

Dated: May 15, 2015

SO ORDERED.

Dated: May 15, 2015.

Email: Kurt.Dzugay@lewisbrisbois.com

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Counsel for Defendants MonaVie, Inc. and

MonaVie, LLC

Dated: May 15, 2015

Hon. Mark Falk, U.S.M.J.

5/19/15